

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO OFFICE OF THE CONSUMER ADVOCATE WITNESS COLLINS
(USPS/OCA-T8-18-23)

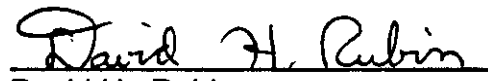
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the
United States Postal Service directs the following interrogatories and requests
for production of documents to Office of the Consumer Advocate witness Collins:
USPS/OCA-T8-18 to 23.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


David H. Rubin

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(202) 268-2986; Fax -6187
June 19, 2000

USPS/OCA-T8-18. Please refer to your testimony on page 9, lines 3-4 and page 4, lines 1-10, where you compare money order fees and cost coverages in this case with those in prior rate cases.

- (a) Confirm that the costing methodology for money orders used by the Commission prior to Docket No. R97-1 is different from the costing methodology for money orders recommended by the Commission in Docket No. R97-1. If you do not confirm, please explain.
- (b) Confirm that the new costing methodology lowered money order costs in Docket No. R97-1, and, if applied, likely would have lowered money order costs in prior dockets. If you do not confirm, please explain why.
- (c) Please confirm that your proposed money order cost coverage is based on the new money order costing methodology, rather than the methodology used prior to Docket No. R97-1. If you do not confirm, please explain why.
- (d) Please confirm that it would be more appropriate to compare your 123 percent proposed money order cost coverage with the cost coverage recommended by the Commission in Docket No. R97-1, rather than the cost coverages in prior dockets. If you do not confirm, please explain.

USPS/OCA-T8-19.

- (a) Please explain the significance of each of the five cost coverages presented in your Exhibit OCA-T-8B.

- (b) Please confirm that the money order cost coverage in Docket No. R97-1, using total money order revenues comparable to the revenues used in the last two cost coverages you present in your Exhibit 8B (i.e., including float), would be $\$293,457/\$156,798 = 187.2$ percent. See PRC Op., R97-1, App. G, pages 1, 24. If you do not confirm, please explain why.

USPS/OCA-T8-20. Please refer to page 10, lines 8-10.

- (a) Confirm that cashing a money order at a postal facility would be considered a retail transaction. If you do not confirm, please explain.
- (b) Confirm that cashing a money order purchased at an APO/FPO at a domestic post office would be considered a retail transaction. If you do not confirm, please explain.
- (c) Confirm that there would be retail transaction costs for the Postal Service for cashing the money order in both (a) and (b) above. If you do not confirm, please explain.

USPS/OCA-T8-21. Given your proposed cost coverage of 123 percent, and the fact that your proposed APO/FPO money order fee would be two-thirds less than your proposed domestic money order fee, do you believe that APO/FPO money orders would generate sufficient revenue to cover their related costs? If so, please explain the basis of your belief. If not, please justify your proposal to reduce the fee for APO/FPO money orders, with respect to pricing criterion 3.

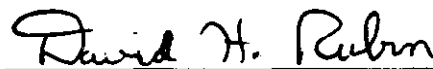
USPS/OCA-T8-22. Please confirm that it would be reasonable for postal employees to spend more time processing a claim for a \$5000 item than processing a claim for a \$200 item. If you do not confirm, please explain why.

USPS/OCA-T8-23. Please refer to your testimony at page 17, lines 6-7.

Describe how electronic Delivery Confirmation service has "matured sufficiently to be effectively provided over the Internet." Please furnish all materials you used to support your statement.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



David H. Rubin

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June 19, 2000